



TETRA TECH

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March 31, 2022

Project Number 08005-WE14

Ms. Sarah Pantelidou
Pennsylvania Department of Environmental Protection
Bureau of Environmental Cleanup and Brownfields
2 East Main Street
Norristown, Pennsylvania 19401

Mr. Angel Adames Corraliza (3SD12)
United States Environmental Protection Agency Region 3
1650 Arch Street
Philadelphia, Pennsylvania 19103

Subject: Addendum to Fourth Five-Year Review
For Transferred BRAC Parcels
Former NAVSTA/NSY Philadelphia
Philadelphia, Pennsylvania

Dear Ms. Pantelidou and Mr. Adames Corraliza:

At the request of the Navy, enclosed is the final Addendum to Fourth Five-Year Review for Transferred Base Realignment and Closure (BRAC) Parcels at the Former Naval Station (NAVSTA)/Shipyard (NSY) Philadelphia. Review comments received from the Pennsylvania Department of Environmental Protection (PADEP) and Environmental Protection Agency Region 3 on the September 2021 draft final version have been summarized in the attached response to comments and incorporated into the final document as applicable.

A hard copy and CD (electronic copy) of the final document is provided.

Sincerely,

Mary M. Mang, CHMM, PMP
Project Manager

MM/nfs

Enclosures – RTCs and Report

c: W. Rachelle Knight (NAVFAC MIDLANT/BRAC PMO East) (CD)
Brian Helland (NAVFAC MIDLANT/BRAC PMO East) (CD)
Lorie Baker (USEPA) (CD)
J. Poe Leggette (PIDC) (CD)
John Trepanowski (Tetra Tech) (w/o attachment)
Free Library of Philadelphia, Thomas F. Donatucci Branch (Paper and CD)
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PADEP and USEPA
Addendum to Fourth Five-Year Review

Reviewer: PADEP (Sarah Pantelidou)

Document: Draft Final Addendum to Fourth Five-Year Review, Girard Point Management Area at Former Naval Station Philadelphia, September 2021

Submission Date: 14-Sep-21

Comment Date: 24-Feb-22

Comment Number	Worksheet, Section, or Figure #	Comment	Response to Comment
GENERAL COMMENTS			
1	na	Girard Point (west of S. 26th St., and north of the Reserve Basin entrance) is only part of the report, so please consider changing the title of the review to reflect the much-larger scope. The Addendum includes information for all the transferred parcels, and likely it will be confusing to have it titled "Girard Point..."	Title revised.
2	na	Deed restrictions should be converted to Environmental Covenants.	The recorded deed restrictions satisfy the Navy's requirement to establish land use controls per the Record of Decision. As Navy no longer owns the property, the current property owner would be responsible to work with PADEP to ensure that the deed restrictions are recorded as environmental covenants that comply with the requirements of the Pennsylvania UECA.

Reviewer: USEPA (Lori Baker)

Document: Draft Final Addendum to Fourth Five-Year Review, Girard Point Management Area at Former Naval Station Philadelphia, September 2021

Submission Date: 14-Sep-21

Comment Date: 18-Mar-22

Comment Number	Worksheet, Section, or Figure #	Comment	Response to Comment
GENERAL COMMENTS			
1	Protectiveness Statement, last sentence	If there is only the one action needed, I would recommend deleting the "(1)" so that there is no confusion that there might have been additional actions that were not included or somehow deleted from the document.	Revised.
2	na	EPA also agrees with PADEP's comments on the name change of the document and the conversion of deed restrictions to environmental covenants.	Title revised. See response to PADEP comment #2.